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UNITED STATES DISTRICT COURT FORETHER OPPENEER WESTERN DISTRICT OF WISCONSIN WOOF W

SAMUEL HAYWOOD MYLES PLAINTIFF,

V3.

MEDICAL STAFF DOCTOR
DOCTOR RAVI GUPTA
IN HIS INDIVIDUAL CAPACITY
AND HIS OFFICIAL CAPACITY

end

MEDICAL STAPE PHARMACIST CHRISTINA KANNEL INHER INDIVIDUAL CADACITY AND HER OFFICIAL CAPACITY DEFENDANTS,

et,el1

MOTION FOR

RECONSIDERATION

FOR APPOINTMENT

OF COUNSEL

UNDER AND PURSUANT

TO

28 U.S.C.S. \$ 1915 (d)

and

28 U.S.C.S. \$ 1915 (e)(1)

Come new Pro-Se Pleintiff Semcel Heywood Myles, Lefere and within the United States District Court For The Western District of Wiscensin, who respectfully seek to file and Metion For Reconsideration For Appointment of Counsel Under And Pursuent to. .. 28 U.S.C.3. 31915 (d)... end... 28 U.S.C.S. 81915 (e) (1).

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- (4). Jecksen vs. Count, of McLeen, 95312.20 1070, 1071 (7th Cir.
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- (13). Poct vi. 8K emp, 2001 WI 42, 81 17, 242 Wis. 2d 507, 125 N.W. 2d 820.
- (14). Mlen us. Themes, 388 F. 3d 147: (5th Cir. 2004)
- (15), Asyemenus. INS. 29 L F.30 871 69th Cir. 2002)
- (12), Nichemmed von United States LE. Scrp. 2d 582: (5th lin, 1998)
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Come new Pro- Se Plaintiff Semuel Hey wood Miller, who re-Spectfully seck to file and Matien For Recensidentie n For Appointment of Counsel Under and Pursuant to 28 U.S.C.S. 8 1915 (d) and 28 U.S.C.S. 8 1915 (e) (1) Lefere and within the United States District Court For The Western District of Wisconsin.

(M.H.) pertenisien (cr) Hypertensive...
(M.Co). Hypertenisien Medicetien)...
...(M. em LODIDine... (2). Lisinopril...

- -(2). IV ... (in travences)...
- (3). Nermelseline Infesion Soletion ...
- (4). EKG (or) ECG... (electrocordiagrem)...
- (5). Podic trist (cr) Chicopodist ...

requires expert testimeny to establish
the stenderd of cere)...

Medical Malpractice Case are Complexity of legalisseues necessity of factual investigation necessity of expent ent testimony from within the Medical fill.

... (and expert witness with direct Medical evidence of the ease and effect relationship between the imperment and the degree)...

And expert witness with skill (er) specialized Knowledge within the comprehens; le reesons to fully explicing within... (D. testimony from the Medical fill of Hypertension (er) Hypertensive... (2) from end full Medical terminolosy es to have... (end)... why Plaintiff blood pressure would lower and drap to 89/55... (3). from end expert witness reasoning that their testimony would research a sensine issue of material fact's for trial...

This Medice I Mel prectice case wereent expert testimeny from and within the Medical filles to the pertic-Ller care and fundamental of having and dealing with... (Hypertenisien (or) Hypertensive)...

The complexity of this case come with legal issues state that this case is (se) complex as the require and trained Attorney to litizate Pro-se Plaintiff and federal Inmate in forma parperis statute provides that the District Court con request an Attorney to represent any Person that I unable to affect Legal Coursel. 28 U.S.C.S. § 1915 (e)(1).

(1), indigent Pro-se Pleintiff SemcelHeywood Myles, here end her made reesenchie effects to retain Legal Coursel... (Under end Pursuent to 28 U.S.C.S. \$ 1915 (e) (1)

(2). in disent Pre- Se Pleintiff SemuelHeywood Mile), here end her ettempt to ettein Legal Cornsel... (Under and Pursuent to 28 U.S.CS. § 1915 (e)(1)... Pleintiff forward everseme... ((170-LETIERS))... to

Atterney (8) within some ... (10-9 tetes)... (0-hio)... (Michisen)... (Illineis)... (Wiscensin)... (Minnesote)... (Kenteky)... (Alebene)... (Meryland)... (Georgia)... (and)
... (Indiena)...

enthe District Court must recognize that in sum, that this ection connet proceed as plad with out enpointment of legal courseli. [28 U.S.C.S. 81915 (d)... (28 U.S.C.S. 81915 (e) (1)... Lecoure of the various legal impediments that's noted within this Medical Malpractice cases...

ne whether the circums tences of a case cre
sufficient to ... werrant ... the eppointmented. .. Legal Counsel. .. the District Coert must exemine the tet clity of the situetion, facusin, on the merits of the ease, the
e complexity of the legal issues, and the lite
is ant chility to represent himself. ...

Come now The-Se Pleintith Sem Lel Hey wood Myles, wherespectfully seek to file and Mation For Reconsideration For Appointment of Coursel (or) Legal Representation Under And Pursuent To 28 U.S.C.S., § 1915 (d)... 28 U.S.C.S., § 1915 (e)(1). Lefore and within the United States District Court For The Western District of Wiscensin.

Come new Pro-Se Plein Ht Samcel Heyword Myles, wherespectfelly file and ... (Bivers)... Complaint under and Perse and To 48 U.S. C. Scation \$ 1983 regarding to and Mediaal Malpractice... (Claim)... in resend to and Medical Drus Overdese frem and ... (incorrect devage)... of high Lload pressure Medication (or) Medicine.

Meintiff. . . (Lloed pressere)... would drep and ... (10wer to 189 OVER 55/). . . Meintiffixes felly ... (enawere)... that he ... (Meintiff)... we's heving (or) experiencing and . . (("Near-Death-Experience"))... cause by and ... (adverse-reaction)... from and ... (incorrect dosese)... of two high Lloed pressure... (Medications)... inwhich was Id cause and ... (Medical-Over dose...

- wood Myles, would be come... (dizzy)...
  (drewsy)... (week)... before... (collepin))... (er)... (pessing out)...
- ... (Pleintiff Semuel Heywood Myles).
  ... ("Mho")... WOLLD heve to seek... (IM-MDIATELY-MEDICAL-ATTENTION RIGHT
  AWAY)... (Plein tiff Semuel Heywood Myles)
  ... Would receive the following in the form
  of ... (Medical-Attention)... (IV intraVenot's drip for... (Normal seline Infusion
  Sclution)... to... (Keep-Oxysen Flowing
  To "Pleintiff Semuel Heywood Myles" Brein)
- ... (Fact is that while seek in ... (IM-MEDICAL-ATIEN TION)... ("PICIntiff Semuel Heywood Myles")... would nersonelly he hoek up to end (EKG) (er) (LECG)
  ... (Machine)... to. e. Imeniton)... "Plein tiff
  Semuel Heywood Myles," (heart eletocordiograme galvon me trie device that detects and record; the minute difference in
  electrepetential cause Ly heart action,,

- c. (Fect is thet on end exoct October &, 2012, "Pleintiff Semuel Heywood Myle"," would personelly receive end pair of ... (Crutches)... do to Pleintiff heving pein in his... ((1)eff-cnkle)...
- ood Myles, was fully unaware that from the October 8, 2018, incident that ic. (his) acolletted cnkle . "was". . . Lroken. . on . . . (Loth side's). . .
- (1-ect is they on end elect October 18, 2012, frem the finding of reviewing endex. emining the... (Photographic Pilms)... frem the 3 set's of... (X-Rey's)... would truly... ("reveal")... that from the October 8, 2012, incident that Plaintiff Semuel Hay wood My-les,... (1eft-enkle was Lraken on Lath sides)

11/27/2012 1.39.24 PM

Mile BILH Medical Center Fey Mile BILH Clinie, LLD Mile BILH Medical Center

PATIENT,

Semuel Myles Inmete

DATE:

11/27,2012 &;15AM

VISIT TYPE.

Office Visit

History of Present Illness."

This skyeer old mele presents with: 1. Lt enkle injury

SUBJECTIVE: ... (inpert)...

(1). Weeked out

(2). 818 teining en isoleted injury to the 1eff enkle. (2). He was diegnosed with a leteral malleoles fracture and was treated with a short-leg pasteriar splint, limited weight hearing with crutches,

OBJECTIVE: ... (in per+)...

- (1). The posterior splint is removed.
- (2), elthough he does have a little bit of swelling medically.
- (3). He has a little bit of tenderness et the medial ankle ligament complex,
- (4). X-rays. I reviewed three sets of x-reys from Oxford.
- (5). He heret least a couple of small corticel evelsions et the tip of the mediel melleoles,

ASSESSMENT. ... (in per+)...

(M. Petient with eleft enkle leterel melleols fracture, with e medial enkle sprein. He is healed enough to come out of
the splint end stert weight beening as telereted. He should discontinue the crutehes whenhe can comfertably beenfull
weight, whether theti's today, a couple
deys, or several deys down the reed.

(2). Now that the splint is removed, any ankle end fact swelling may become more enominently seen and he can have the s-welling come and so, depending on his leve-18 of activity es well as amount of time elevation, and can be expected aventhe next few weeks to few menths.

Provider: RoLert R. Riedle MD 11/27/2012 Electronically signed Ly RoLert R. Riedle MD on 11/27/2012 9:23 AM Pre-Se Picintiff Semuel Heywood Myles, ... (I'm still having the white with myle-H feet. .. Pein running across my feet seme four inches up the beck of my ceth from my enkle cleut five inches... As of dete I... ("Semuel Heywood Myles,") ... Persenelly welk with end slight limp)...

Pro- Se Pleintiff Semcel Heywood Myles. .. (from the October 8, 2012, incident
regerding my left enkle is that I'm... (
un able to ware the Institutionalissued. .. Boots. .. when welking in these.
.. Boots. .. (er) eny Herd. Shoe's my feof seme to twizzle and ... (turn in werd). .. (elso their's and centinhing sereness (er) pein my ... (left enkle)...

requires expert testimeny to establish the standard of care)...

who personelly specialized training in the trectment or management in the fill of hypertensive, who has considerable experience in thet subject)...

Come new Pro- se Pleintiff semuelHeywood Myles, with and Medical Malpractice Claim regarding and Medical Dray Overdose...

... We showing of medical malpractice.

Would require (8) expet... (witness)...te
stimeny to fully establish the standard of

cere))...

Pleintiff blood pressure would lower and dren to 89/55 from two... (Hypertenisien (ar) Hypertensive)... Medications)... ... (from the) ... Dorlend's Illustrated Medical Dictionary Hypertension

abnormally high enterial blood pressure that is (1). usu.indicated Lyan adult systolic blood pressure of 140 mm Hy or greater or a diastolic blood pressure of gomm Hy or greater, is chiefly of unknown cause but may be ethnibutable to a preaxistim condition (es renol or endoerine disorder); and that is a risk factor for various nethological conditions or events (as heart attack or stroke) SEE ESSENTIAL HYPERTENSION, SECONDARY HYPERTEN-

SION, WHITE COAT HYPERTENSION

a systemic condition resulting from hyperten-(2). sienthet is either symptomless or is accompanied esp. Ly dizziness, nelpitetiens, feinting, or headache)

Medical Malpractice Case are Complexity
les al issues necessity of factual investigation
necessity of expert testimony within the Medical fill regarding to ... (("Hypertenision" (er)"Hypertensive")... with and fill elevation of the
... (Blood Pressure esp.)... and expert withess with direct "Medical" exidence of the cause and effect relationship Letween the impairment and the degree...

And expert witness is warrent with the skill's (or) specialized Knowledge within the comprehensible reason's to fully explain...

- (1). Hypertenision (er) Hypertensive
- 12). Llood pressere
- (3). Woodpressure lewer end drep
- (4). Hypertenision Medicchien's... (emloDIPine)...(LISINOPR)...

Medical Malprochica Case are complexity of legal issue, necessity of factual investigation necessity of expert testimony within the Medical fill regarding to ... ("Hypertenision (er) Hypertensive")... with and fill elevation of the... (Lload pressure)... (esp.)...

And expert witness with direct... (Mediccl Evidence)... of the cause and effect reletionship hetween the impairment and the degree...

And expert withers with... (skills (ar) speciclized Knewleds e within the comprehensible recson's to fully...(LXPLAIN)... within...

- (1), the Medical fill of Hypertenisien (cm) Mypertensive...
- (2), fremend fell Medical terminalegy c) to how (end) why Plaintiff Lloed pressure would lower end drap to 89155...
- (3), only effer some several days of taking (two) Hypertensive Medication (ar) Hypertensive Medication (ar) Medicine's inwhich would cause

Plaintiff to have adverse reaction from end combination Medication that would cause Maintiff to pass out...

(4). expert testimeny within the Medicel fill reserving to the Medicetien (er) Medieine's... (em LODIPine... LISINOPR)... treet Hypertenision (er) Hypertensive... high Lload pressure...

(5). end expert withers who specialized in ... (Hypertensive) un (er) Hypertensive)

... recogning that their testimeny would raise a genuine issue of material facts for trick.

This Medical Melproctica Claim Werrant.

(1). not only... (expert testime ay)... from end within the Medical fill of ... (Hypertension (ex) Mypertensive)...

This Medical Malpractice Cases Wernert...

(8). expent testimony es to the pertie-Ller cere resending the fundementel of heving. . . (Hypentenision (er) Hypertensive and decling with it). . .

This Medical Melpreetiee Cose Werrent...

(3). expent testimony rejending to end Medical Dres Overdese...

Medical Malpractice Case's are Complexityles sel issues necessity of factual investigation neces soity of expeat testimeny:

... on end elect de toler 8,2012, Pleintiff Sencelley wood Miller, would be trected with end influsion within respect to Medical-Attention rejording to end ... (Intreveneusly)... uses e elend... (IV).... ... Con concere tes to administer a fluid (cs) and Medication, blood, we ter in the form of normalsaline influsion solution and nutrients in travenously...

... (Pleintiff SemuelHeywood Myles, would receive within the ferm of ... (Med-ical Attention)... and ... (IV)... (er)... (Intrevenous Drip's for Normalsaline Inf-usion Solution)... te... (Keen Oxysen Flewing to Plaintiff Semuel Heywood Myles, Brain)...

29 th Edition ... .
Dorland's Illustrated Medical Dictionary

IV ... In tray enous

<sup>(1).</sup> intravenous

<sup>(2).</sup> intrevenues drops

<sup>(3)</sup> intreveneus injection

<sup>(4)</sup> intrevenously

- (1). the act of fereing eliquid into a pert, cs into the subscribeneous tissues, the voscular tree, or an organ intravenously (by intravenous injection)...
- (1). en epperatus used to administer a fluid (es of medication, blood or nutrients) intrevenously. elso. a fluid administered by IV...
  - (2), a fluid administered Ly IV...
- Mintravenous, , an injection made into a vein.

Medical Malproatica Case's are Complexity of lesal issues necessity of factual investigation necessity of expert testimony within the Medical fill resording to ... (IV... (or)... Intravenous)... us, age with and fill elevation the ... (Medical)... (terminalogy)... And expert witness with direct... (Medccl Evidence)... of the... (uscse)... and effect relationship Letween the impairment and the degree of... (usias)... and... (IV)...

And expent witness with... (skills) (or) speciclized Knawledge within the comprehensilele recons within the Medical fill to fully... ((" EXPLAIN"))...

Medical Malnicative Cases and complexity of legal issues necessity of factual investigation from and skill (er) specialized... (individual)... with the Knewledge and comprehensible reasons to fully explain the establish standard of... (Medical Care)... resending to the ... (Human Brain)... i and expert witness with... (dinect Medical evidence)... of the cause and effect relationship Letween the impairment and the degree regarding the... (Human Brain)

Pleintiff SemuelHeywood Myles, wes treeted with end. .. (Intreveneus Drips Sodium Choride D. 98 Inj 1000 ML). ..

GENERIC NAME.

Intravenous (IV) Fluids (in truh VEE nuhs FLOO ids)

... (from the) ...

Derlend's Illustrated Medical Dietionary Influsion

- (1), the steeping of e substance in water to obtain its medicinal principles.
- (2). the product of the process of steeping a dray for the extraction of its medical principles.
- (3). the therepetite introduction of efluid other then bloedies saline salution, into evein.

NOTE: An infusion flows in Ly gravity, en injection is forced in Ly a syringe, on instillation is dropped in, and an insuffiction is blown in.

## infusion

sclinei, administration, either subcutaneously or intravenusly of saline solution,

i. (Plaintiff Semuel Hay wood Myle), wes treeted with... (Sadium Chlaride 0.98 Inj 1800 ML)... and Intreveneus Drip Nermal Saline Infusion Salutian... to "Keep"... (c"OXYGEN-FLOWING"))... to Plaintiff... (Sem-Lel Heywood Myles)... (BRAIN)...

Medical Malprochice Codes are Complexity legal issues necessity of factual investigation of expert testimenty framend (full... (Medical Terminalary within the Medical)... (findin)... of the ... ("Humen Brain")... requires expent testimony to fully establishthe Medical standard of ... (ecre)... with skill,

(an) specialized knowledge within the comprehensible necsons to fully ... (explain the full

Medical Terminology and the ... (Functionia)

of the Human Brain)...

THE OTHER BRAIN

Ly ...

R. DOUCLAS FILLDS (Ph.D.)
PHILOSOPHIA DOCTOR

"The Other Brein offers an insightal, compley, and numbered picture of the most interesting

substance on earth:

the metter inside our heeds."
The Scientifie and Medical
Breakthroughs That Will
Necloumbrain and

Revolutionize Our Health

- in Medicel (or) Immediate Medicel (or) Immediate Medicel Attention Plaintiff Samuel Hery wood Myles, would personally be... (hook up to end... (EKC) (or) (ECC)... (Mechine)... to meniter Plaintiff heart... (electrocerdiogram)... (gel varametrice)... device that detects and records the minute difference in electrical petential cause by heart action)...
  - ... (EKG (er) ECG Electrocerdiogram).
    . Mechine to meniter "Plaintiff" heart reate from that near dect experienc...
  - cose) requires expert testimeny to fully establish the Medical stendend of core with skills (or) specialized Knewledge within the comprehensible recsens to fully explain the full Medical Terminelesy and the ... (Functioning (or) Lzege of end ERB (or) ECB Mechine).

Medical Malpreetice Cases one Complexity legal issues necessity of factual investigation of exnert testimony from and Hull IM edical Terminalasy esn. and expert witness with direct "Mediccl" evidence of the cause and effect degree.

And expert witness is warrant with the ski11's (cr) specialized knowledge within the comprehensize reconstability explain the standard of
Medical Care regarding to the functioning (cr) usage
of the ... (EKB Cor) ECB electrocardiagram galvanametric Mechine)...

Ecc., electrocardiogram

EKB...electrocerdiogram

Come new, Pro-Se Plaintiff Semue / Heywood Myles, who respectfully seek to file and Metion For Reconsideration For Appointment of Coursel (or) Legal Representation Under and Personnt To 28 U.S.C. 8. 81915 (d). ... 28U.S.C. 8. 81915 (e)()... Lefere and within the United States District Court For The Western District Court For The Western District Court For The Western District Of Wisconsin.

Pre-Se Pleintiff Semuel Haywood Myles I respectfully file and. ... (Bivens). .. Compleint under end Persuent To 42. U.S.C. Section \$1983 reserving to and Medical Drug Quendose, Medical Magnectice Coses (cre) Complexity (with) legal issues. ...

seventh Circuit Zernes...

the pleintiff must demonstrate that has ease is an a appropriate for the appointment of coursel)...

... (In Meelin v. Freeke, L50 F. 2d 885, 887-89 (7th Cir. 1981). we set out a nonexhoustive list of five fectors for courts to consider when deciding such a motion:

(1). the merits of the plaintiff's claims;

(2). whether the plaintiff con investigate cruici fact,

(3), whether trained counsel will be Herexpese the truth;

(4). the plaintiff's ability to present the cese;

issues.

The complexity of this case come with legalissues

State that this case is (so) complex as to require and trained Attarney to litigate Pro-Se Plaintiff and federal I nomate informa parperis statute provides that the Distriat Court can request an Atorney to represent any persan that sunable to afferd Legal Coursel 28 U.S.C.S 8

1915 (e)(1) ... (and)... 28 U.S.C.S. 81915 (d)...

- sem, the District Courtmust recognize that in sem, that this ection connet proceed as pled with-out conneintment of Legal Counsel... 28 U.S.C.S. 519 15 (e)(1)... Lecause of the various legal impediments that's noted within this Medical Mel practice case... 28 U.S.C.S. 5 1915 (d)...
  - training, the case was earnlex and the circumstences were exceptional. Agy emen., (8), the complexity of the leselissues raisedly the complexity of the leselissues raisedly the compleint. Meclin. (3). Some cases—those involving complex medical evidence, for example—cretypically more difficult for pro-sepleintiffs. Pruit. (4). the compleinty of the relevant legalissues. Meclin.
  - mine whether the circumstences of ceese are sufficient to... werrent. othe eppeintment of ... Lesel Coensel. othe District Court must exemine the tetality of the situction, fecusing enthe

merits of the cese, the complexity of the lesel issees, end the litis ent elility for epresent himself...

Medical Malpractice Coses are Complexity legal issues necessity of factual investigation of expert testimeny from and full Medical Terminology within the establish Medical standard of care with skills (or) specialized Knowledge within the comprehensible reconstability explain the full Medical Terminology and as to the ... (function in al)...

(1).(e). Hypertenision (cr) Hypertensive (1).(e). Hypertenision Medicetiens... (D.(D.cm LODIPine...(2).(2). Lisinopril...

requires expend testimeny to estellishe
the stenderd of care)...

Medical Malpractice Case are complexity of legal issues necessity of factual investigation of expert testimony from within the Medical Pill.

··· lend expert withers with direct Medical evidence of the accs e and effect relationship Letween the impairment and the degree)...

... (1). Under Rule 702, en expert mey testify it. a) the expertis specialized Knewledge will essist the thier of fectibi the testimeny is Lesed upon sufficient fee-+s er deta, Fersyther. (8). A shewing ef medical malpractice requires expert testimeny to establish the standard effect. e, except in the rare instance in which cemmen knowledge afferds a Lesis for finding restisence. Corney-Heyes .. . (3). Zi: mmenhes Leen elle to con selt its expert end respend to Dr. Medin's efficients end will have the opportunity to question Dr. Medlin reserding ellor his methods end opinions-including the new opinions in the Celculations Affidevitet a Decleat hearing . Zimmer ...

And expert witness with skill (er) specialized knowledge within the comprehensible reasons to fully explain within... (1). testimony from the Medical fill of My pertension (er) Hypertensive... (2). from end full Medical terminology as to have... (end)... why Plaintiff blood pressure would lower and drop to 89/55... (3). from and expert witness reasoning that their testimony would raise a genuine issue of material fact's far trial...

This Medical Malpractice case werrant expert testimany from and within the Medical fill as to the particuler care and fundamental of having and dealing with ... (Hypentenisian (or) Hypentensive)...

The complexity of this case come with legalissues state that this case is (so) complexes to require and trained Attenney to litigate Pro- Se Plaintiff and federal Inmete in forme peuperis statute prevides that the District Court can request an Attenney to represent any person that's unable to efford Legal Coursel, 28 U.S.C.S. § 1915 (e)(1)...28 U.S.C.S. § 1915 (d)...

# ...(2). IV... (intrevences)...

chid (es) & medication, Llocal, contrier-

ered Ly IV)...

Heywood Myles, Leen. . . (trected). . . with intrevences drips Sodiem Chleride 0.98. Inj 1000 ML CENERIC NAME. Intrevences (IV) Fluids (in truh VEE pehs Flooids)

... (from the) ...

Perland Illes trated Medical Dictionery

Sodicem Chloride and intravences drip Nermal Scline Infusion Salution to Keen... (OXVEEN PLOWING)... to Plaintiff Samuel Haywood
My100, (4BRAJM")...

Medical Melnrectiee Ceses ere Cemplexity legelissees necessity al lectual investigation necessity al exnert testimony from and full Medical Terminalesy reserding to the ... ("Heman" "Brain")...

> ... (1). There, we reversed the court's decision to deny counsel Leccuse of the "difficult and { 14 F. 3 d 289 } seltle questien of the state of mind required [taprove] efecteenth Amendment vicletien." Swefferd ... (2). Dr. Medlin Stetes in hise-Hidevit that Dr. Kirtz used only five of his six total redii measurements (see Col. celetiens Affidevit 173), but Dr. Kertz's report end deposition testimeny state that he used all six measurements. (See Kentz Ren. et 3 ("e series of six cincontenentiorreundress profiles [were] measered et 1.9 mm ventieclinerements ent. he surface of the tapen, Rurtz Denoct 145:17-23 ("Q." ... Why didyee tele vix circemferentiel roundness profiles el the device?

A. Beechse we wented to recreete the typer engle, enyly meking energh exict mees knements. . . you can recenstruct the engle. ").). Zimmer. . .

Medical Malprectice Cases are Complexity legal issues necessity of fectual investigation of expert ters timony from and (fall), Medical Terminalary Mithin the Medical finding of the ..., ("Heman" "Brain")... o eshowing of Medical Melprectice cases requires expert testimony to specialized Knowledge within the comprehensible reasons to fully explain the full Medical Terminology and the ... offenctioning)... of the ... ("Heman" Brain")... of the ... ("Heman" Brain")...

acine expent testimony to establish
the stendend of core. Corney-Heyesa,...

(2), The defendent has since retained a
medical expent, Dr. Bears a Ven Here, in
pedictric eletrophysiology. Dr. Kakevand

... From the author of the hook thee...

The Other Brain

"The Other Brein affers en insightAl, complex, and meaned picture of the most interesting substance an earth." the metter inside our heeds."

The Scientific and Medical Breakthrough) That Will Heal Our Brain and Revelutionize Our Health

R. Dengles Fields Philosenhie Doctor

De to Plaintiff Semuel Heywood Myles, Lecemins dehydrated from this adverse reaction eccsion Plaintiff to receive "immediately" Medical attention at the therticular time medical staff would enply end. .. (IV). .. epperatus to the edminister and ... (intrevenus drip) for ... (Non-mel Saline Influsion Salution). .. to keep. ... ("OXBEN PLOWING to Plaintiff Semuel Haywood Myles, Broin"). ..

Rect is that while seeking "immediate" Medical Attention Dlaintiff Semcellay wood Myles, well of personally Le hook en to end ... (EKB)... (or)... (ECB)... (Mechine)... to moniter... ("Plaintiff" "Samuel Haywood Myles")... he ent ... (electrocardiogram solvenometrie device that detect's and record's the minute difference in electrical naterial cause Ly heart action)...

... We often find counsel necessary when a case involves complex medical evidence. See, e.g., Jeckson, 953 F. 2d at 1073;

Medical Malpraetice Coses ere Complexity les el issues necessity of factual investigation from and skill (er) specielized individual with the knowledge and comprehesille recsons to fully explain the establish standard of medical care regarding to the ... (full)... Medical Terminolesy for ... (EKC)... (or)... (ECG)... (electrocardiagram mechine)...

metters of comment nowledge, which meens that they would require expert testimeny.

Medical Melpractice Ceses ere Complexity legal issues necessity of fectual investigation necessity of expert testiment within the Medical fill resending to ... (Podictrist), ... (Chironodist)... (the Human Feet)... with and fill elevation of the ... (Freeture)... esp. of the Iet mellealis centirmed and expert withess with direct "Medical" evidence of the cause and effect relationship Letween the impairment and the degree.

is the same, however, Zimmer is correct that the methodology and deta on which thet conell sien is besed are different, and the Calarletiens Affidavit, eccendingly, is technically enew opinion. See Only The First, Ltd.

And expert witness is werrent with the skill (er) speciclized knowledge within the comprehensible rees ons to fully explain within the diagnosed of a lateral meliedus fracture... Pre-Se Mointiff Some Hoywood Mylos, Claim regerding end Medical Medical Medical Medical Medical Medical Drag Overdose from land) in correct dase of ... (High Blacod Pressure Medications)... (1). Em LODI Pine... (2). Lising pr... (Cim (cr) Complaint a scinst Institution - cl Medical Staff at Federal Correctional Institution Oxford... (1). for injuries sustained as a result of an everdose of the drug Xylocaine. Wings toom... (2). A shewing of medical mellocative requires expert testimony to establish the standard of core, except in the raise instance in which common Knowledge efferds a Losis for finding resligence. Canney-Heyes...

Pre-Se Plaintiff Semcel Heyward Myles, Cleim regarding to and Medical Malpractice Claim regarding to and Med. I cal Drug Overdose... (a showing of Medical Malpractice Cases require expert testimony to... (fully)... esteblish the standard of Medical Care)... Plaintiff Wheed Pressure would lower and drop to... (89/55)... from two... (Hypertension Medications... (1). claim he seff. ered by reason of alleged improper medical treet ment by prisen medical personal. Muhammed.

And expert witness with skill (s) (er) specialized knowledge within the comprehesible reasons to felly explcion within... (D. the Medical fill of Hypertenision (er)

Hypertensive... (l) from end fell Medical Terminolessy as
to haw (end) why Plaintiff Samuel Haywood Myles,... (BLOOD. PRES) URE)... would lower and... (Dropto 89/55)e...

Causing Plaintiff Samuel Haywood Myles; to ... ("passingety)

Inframend... (combination)... of Hypertenision Medication(s)... (3). and expert with ess who specialized in

co (Hypertenision (a) Hypertensive)... reason in that
their testimory would raise a sensine issue of motorial
fact(s) for trial...

ned a medical expert, Dr. Becage Hen Harefin pedictrie electrophysicles you. (2),
medical malpractice ceses require expert
testimony to establish the standard of
care. Carney-Heyesow (3), two different
surgical expert with esses, Dr. Sidney Rohrscheib and Dr. Bay Dagon, Lecase such
testimony would be cumulative. Forsythe...

... when recruiting econsel the count have to take and accumt the difficalty of the Plain tiff Claim to Le compe. tener to litiget ethese Clein himselle. The difficulty of this ease consided (both) es (n. expert testimenz... (requires expentestimony. Carney-Heyes). .. ("all withnesses who ere to sive expent testiamony · Fordythe) . . . (R) . end do to the compley isscesthis eese werrent end etterney ... Clikewise, there ere ne herd end fest rules for evalution the fectual and legal difficulty of the pleintiff's claims. We have previously elserved that some coses -- 2503F.3d LSL } there involving complex medical evidence, for exemple -- are typically more difficult for pro-se plainti-As. See Zernes). .. (Stewart, J., concirring). Unskilled in law, uncided Ly counsel, end uneble to leeve the prison, e prese prisoner's control eyer the process in of his notice necessarily ceeses es seenes he hendsit eve

to the enty public officiels two when he has access-the prisen exthorities-end the enly infermetion he will likely have is the date he delivered the notice to those actherities and the date white et altimetely stemped spenit. I prose priseners connet personally travel to the courthouse to see that the notice is stemped if iled or to establish the date an which the court received the notice. Fellens...

The difficulty of eny Medical Malpractice cose-factually and lesally -- exceeds the particular Plaintiff's canceity as a lay person to eaherently present it to the judge (or) jury him self in given the object are of difficulty when seeking without in the Medical fill as expert without the case werent evel eating the factual and lesal standard that con only come from legal counsel (or) and train Atterney.

...(1). involving complex Medical Melnrectice exidence (cr) issues requires exnert testimeny... See., (EXHIBIT ... C. (A).

Patient Medication Information em LODIPine 10 MB TAB GENERIC NAME: AMLODIPINE (cm-LOE-di-peen)

See ... (L'XHIBIT ... C. (B).

BLrece of Prisons Heelth Services Clinical Enceenter-Administrative Nate Generated 12/25/2012 19:15 Mclcom, BradRN BLrece of Prisons-OXF Page Solb

See...(EXHIBIT ... (.(C).

Burece of Prisans Health Services Clinical Encounter-Administrative Nete Benerated 1212512012 19:15 Malcam, BradRNI Burecu of Prisans-OXF Pose5 AL De to Plaintiff SemuelHeywood Myles, Leeeming de hydnet ed from this edverse recetien cousing Plaintiff SemLel Heywood Myles, to receive... ("Immediate Medical
Attention")... at that perticuter time Medical Staff
would use and... (IV)... apparatus to... ("edminister")
... and... (Intravenous)... drips for... (Nermal Seline
Infusion Schtien)... to Keep... ("OXYBEN")... flowing
to Plaintiff Semuel Heywood Myles,... (BRAIN)... (1). cose
involves complex medical evidence. See, e.g., Jackson,)...
(2). which led to an anaxic brainingury. Forsythe)...

Medical Malpraetice Case are complexity legal issues necessity of feathal. . . ("investigation"). . . (1), prose Plaintiff was ineapable of engaging in any investigation; or locating and presenting key witnesses or evidence; Pruitt). . . necessity that warrant both. .

(1)./ezel Cornsel...(1). eppointment of earnsel. In Maclin)...(2). complex medical evidence. See, e.g., Jeckson)...(3). Some ceses-- those involving complex medical evidence, for example--are typically more difficult for prose plaintiffs. Pruit)...(4). Lecause the claiment leaked

training, the ease was complex and the circumstances were exceptional. Asy emen)...

(5) unelle to leave the prison... prose prisoners connet personally travel to the courthouse... and exidence as any of these issues will be herd to eame by for the prisoner en earlined to his cell, . Fellen...

(1). expert testimony reserding tethe Medicetion (cr) Medicine... (Normal Saline Infesion Saletion)... (See...D. (A). 2 Pe) e EXHIB-II). a. end... (See...D. (B), EXHIBIT)...

A shewing of Medical Melprectice Claim requires expert testimeny to Delly estellish the Medical-Stendard of Care with skills (cr) specialized knowledge within the compre ehensi Ller eesens to felly. "("explain"). " within the Medical fill of Pherme eectical Medication (cr) Medicine... (1). Wing strom. "(2). medical melprectice requires expert testimeny. Corney-Hoyes)...

This. c. (Cleim (co) lese)... ("werrent")... expert test.
imony reserving to Plaintiff Leins to ected with Inferior Selltion to keep Oxyben flowing to the ... (BRAIN)...

Medical Malpractice Cases are complexity...(1),(5). the complexity of the relevant legalisshes, Macin's)...

(8). Medical Malpractice. Corney-Hayes)...(3). the case was complex and the circumstance were exceptional. Asymmen)...legalissues necessity of factualiny-estigation...(4). For example, if the record demanstrates that the prose plaintiff was incapable of engasing in any investigation, or locating and presenting Key witnesses (ar) evidence; Praith)...necessity of expert testimony...

Pro 8 e Plaintiff SemuelHeywood Myles, in regard to receiving... (Medical-Hentian)... Plaintiff SemuelHeywood My. les, would be treated with and... (Influsion)... (IV)... Intravenous drins for... (Normal Saline Influsion Solution... (See... 1). (A). 2 Page EXHIBIT Patient Medication Information Sodium CHLORIDED. 9.8 Inj. 1000 ML BENERIC NA-ME. Intravenous (IV) Fluid (in truh VEE nuhs FLOD ids)... (See... D. (B). Bureau of Prisons Health Service Clinical Encounter Administrative Note)... intravenous drips for... (Normal Saline Influsion Solution)... to Keep... (OXYB-LEN)... flowing to Plaintiff SemuelHeywood Myles, BRAIN...

Medical Melpeactice Coses are Complexityles of 1886es necessity at factual investigation from and skill (ea)
specialized individual with the knowledge and comprehentile reasons to fully explain the establish standard of
medical core rescrains to the medical terminology for
... (EKG)... (cr)... (ECG)... and the uses of end... (LIKE)
... (cr)... (ECG)... ("mechine") to manitar the... ("Humen" Heertu Rete")... Ly way of electrocordisgram
a solucnometric device that detects and records the
minute difference in electrochine net entide easedly
hert oction...

cel expert witnesses, Dr. Sidney Rehrse heir end Dr. Boy Desen, leceuse such testimony would be cumulative. Forsy the . c. (2). cese involves compley medicel evidence. See, e.s., Jack sen. . (3). the complexity of the relevent lesel issues. . . siven the difficulty of the eese. Zernes. .

Medical Malpraetice coses are complexity legal issues
necessity of feetall investigation. .. (1) ner de he has the
eLility to investigate the feets of the cose, Praite conception
ity as expert to timery ... (2) relicality of expert to time
ony, Lapsyey...

Pleintel Somcellay woodMylas, while receiving Medical Affention Prom this. .. ("In eer" " decth" " experience"). .. would be head on to end. .. ([[KB]... (ECG)... machine to monitor the culture men" "Heert"). .. Ly way of electrocordie from a solono mentric device that detects and records the minute difference in electric potential accessed by heart action...

eleatrocerdio, rephe sclvenemetric device that detects end recerds the minute difference in electric petential ecosed by heart ection end occurring Letween different parts of the Lady. ...

See... (EXHIBIT. .. E. (A).

Berece el Prisers Heelth Pervices Clinical Encounter-Administrative Nate Medical Malprectice Coseis... ("come's")... with complexity. (el)...leselisses that's necessity of feetal investigation necessity that werrent Lath...

### ... (1). legel econsel...

he cese. Pruitt... (2). the exility of the indisent to invertise to creciel facts. Beanhill... These effects demenstrate, Zernes's elility to investise to the underlying facts despite her incorcention in Colifonnia, Zernes...

# . . . (2) . expert testimony ...

...(1). expent testimeny from Ms. Per-Ker's treating hemetologist (Lloed deeten) Fersythe)...(2). medical malpractice reqwines expent testimeny. Corney-Hayes... (3). expent testimeny in extreme case. Richards... On and a Leat Octeler & 2012, Pre-SePleintiff Someel Hey wood Mylos I would be come light heeded, et that pertic-Uen time Pleintiff well of personelly report this to the Unit Officer Mro Grensee, Lefore possion out.

Pleintiff SemcelHeywood Myles, Lody weight would shi-At to the left ride of his left les, ... being uneble to ... (welk) ... Medical Steff Registered Nurse Brel Melcem, would iss-Le Pleintiff end... (pein of crutches...

On and elect October 18, 2012 some several set's of....
(X-Rey-s)... well dhe teken of Plaintit left conkle...

... (1). c rediepnent mede Ly x-reys. ..

ith x-ray soca

expert testimony to estellish the stendend of core. Conney-Hayes...

... (2). We often find counsel necessary when acse involves complex medical exidence. See. C.s., Jackson...

On end about Detaber 18, 2012, some... (10-12eys).

efter and from the Detaber 8, 2012, incidenten, would

Institutional Medical Staff Registered Nurse Mr. Br
ed Malcam, would personally receive some three se
t's of... ("X"-"Reys")... from the Institution radio
logist...

i. hospitel where x-reys were taken.

Zernes. .. plaintiff told Dr. Kelker thet

his left enkle peinhad less ened with the

immobilizer hoot. Belsewicz. .. hed

reviewed new x-reys. Bellerd. .. medic
al melpractice cases require expert te
stimens, to establish the stendard elea
re. Carney-Heyes. ..

enly to reveal that from. (his). finding is the taker reviewing the three set's of . ("X"-"Reys")...

18 that Plaintiff SamuelHaywood Myles, . . (left enkle was Lraken on both sides...

Frem his finding Institutional Registered Nurse Mr. Bred Male om, would personally request that the Institutional Medical Staff Doctor, Doctor King, to personally review. . . (ell)... three set's of... (X-Reys)...

1) octor King, would personally effirm that from the
... ("X"-"Reys")... teken some... (10-10 eys) lated is
that Plaintiff Samuel Hey wood Myles, ... («left enkle
was Locken on Loth side)»...

At thet perticular time Decter Kin, well personally recommen that Registered Nurse Mr. BradMelcamito treate Plaintiff Semuel Heywood Myles, with and shart-les posterier splint with each whop and instruction for RICE therepy end limited weight Leannows. Medical Melpractice Case's are complexity allesclissues necessity of factual investigation from and skill (cr) specialized individual with the knowledge and comprehesible reasons to fully explain the estellish standerd of Medical Care regarding to the ... ("Human" "Footing c... (Pedic trist (cr) Chiropodist).

cture of the left malled as confirmed"

On end about Nevember 27, 2012, Pleintit SemuelHeywood Myles, would be transperted to Mile BILA Clinic,
LLP Mile Bleff Medical Center, and et that perticular
time Plaintiff SomuelHaywood Myles, would personally be
seen by Medical Stoff Doctor, Dectar Robert R. Riedley
and... (Orthopedic Specialist)... who et that particular time would... (personally)... diagnosed Plaintiff SemuelHaywood Myles, with a leteral melically frecture...

Frem Orthopedic Specielist Medical DectoriDector Robert R. Riedle, assessment of the ... ((1) X"-"Rey's)

... (OB JECTIVE INPART) ...

c... (The posterior splint is removed.)...

cltheigh he does have elittle Lit of swelling medicity.)... (The petient notes some

tenderness topelpetien throughout the

mejerity of the length of the fibule)... He

has a little bit of tenderness at the medial ankle ligament complex; ... (Caff

compertment is soft and nontender.)

...(X-reys INPART)...

from Oxford.)... (This consists of con conkle series and a foct series from October)

... (These show the nondisplaced laterel malleoles fracture.)... (He has at leest a couple of small cortical evulsions at the tip of the medici malleolus, but the medial melleales it self hese little Lit of misshepen cheracier/zetien,)...

ASSESSMENT. See Exhibit Decementation.

On end eLact November 27, 2012, Orthopedie Specielist Medical Decter Rebert R. Riedle, diegnesed Plcintiff with a leteral mellocks freeter e end remeved splint... cantinued left fact, ankle swelling may be eeme mare prominently seen Plaintiff can have swelling come and saidenending on levels of activity...

Medical Malpractice Cases are Complexity of lesal issues necessity of factual investing ation... (medical malpractice requires expert testiment to establish the standard of care, Carney-Heyes)... (We affentind counsel necessary when a case involves complex medical evidence. See, e.g., Jackson)... (evidence an eny of these issues will be hard to come Ly for the prisoner confined to his cell... pro-se prisoner) connet personally trayel to the counthouse. Fallens... from end skill (er) specialized individual with the knowledge and comprehensible reasons to fully explain the establish standard of Medical Care regarding to the ... (Human Foot)... (Orthopedia Specialist)... and expert witness with direct... (Medical Evidence)... of the cause and effect relationship between the impairment and the degree)...

Medical Malpractice cases requires expert testimany to establish the medical standard of care to felly explain the full medical termindery and the functioning of the... (Human Foot)...

... (M. Where the indigent is in no position to investigate crucial facts, counsel should often he eppeinted. Maclin)

... (R). nor do he has the ability to investigate the facts of the case, nor do he has the ability and/or location interviewing the other. Praith)... (B). We often find counselnease. Secry when a case involves complex medical evidence. See, e.S., Jackson)... (4). A showing of medical malpracti-

ce requires expert testiment to establish the standard of care, Cerney-Hayes)... (5). the expert has applied the eprinciples and methods reliably to the facts of the

cese. Fersythe)...

(, medical melpractice cages requires expert testimony to establish the standard of eare. Corney-Heyes v. Northwest Wiscensin Home Care, Inc.,)... (the ability of the indigent plaintiff to investigate crucial feets unaided by coursel, Jackson v. County of Malean)... Medical Malpractice Cases are Complexity with legal 183 hes necessity of fact Lel investigation necessity that werrant both... (1), legal coursel... (8). expert testimony...

Pein. ("8 till"). .. remein eeress Pleintith left fect enkle end some five inches up the back of Pleintith left les es well es of dete Pleintith SemuelHeywood Myles, when vuelking here end her Leen elter elso es of dete Pleintith wielk with end slight limp. ..

At this perficuler time from the October 8, 2012, incident Plaintiff SomeelHaywood Myleziis still heving pain (en) thouse with his left enkle, feet and pain his left les...

(2). His necretorical examination was positive, discolosing relative week ness of his right les and fect. Muhammed.)... (3). Defendents Knewer should have known that failure to ellew Plaintiff to wear his prescription shows would conserve him harm and that Plaintiff was harmed by Defendent refusalts ellew him to ween such shoes. Manell,)...

... ilee Attachment)...

... (Also see Attachment of (9) Pose Exhibit...

#### . . EXHIBITS TABLE OF CONTENTS ...

- F.(A). Exhibit. .. (F.(A)... from the ... Derland's Illustrated Medical Dictionary ... Page 195 ... (Foct. (Top), Longitudinal section; (bottom), dersel espect.
- F.(B). Exhibit... (F.(B)... from the... Derlend's

  Illustrated Medical Dictionary... Pege 709

  ... (Plate 18-Various Types of Fractures).

  ... (1). the breeking of a part, especially a
  bane... (2). a break or rupture in a bane

  ... (Colles'f., fracture of the lower end of
  the radius in which the lower fragment is
  displaced posteriorly (see Plate 18)...
- F.(C). Exhibit... (F.C)... from the... Decland's

  The streted Medical Dictionary... Pope 105/
  ... (Malleoles leterall's Ceteral melleoles) and

  malleoles medicals (medial melleoles), articulating with the talks in the ankle joint.

# EXHIBITS TABLES OF CONTENTS.

- F.(D). Exhibit. .. (F.(D). Bureeu of Prisons Heelth Services Clinical Encounter.
- F.(E). Lightlit, ... (F.(E)... Bhrech efficien) Hedth Service, Clinical Encounter-Administrative Note.
- Services Consultation Request.
- F.(6). Exhilit... (F.(6)... MileBluff Clinic, LLP Mile Bluff Medical Center.
- Medical Administrative Netes.
- F.(I). Exhibit...(F.(I)...(E-Meil)...!"MYLES, ~ A !SANIUEL HAYWOOD" < OB 218 041 @ inmate messese. Cem > 10121/2013 9: 28 AM >>> TO DOCTER MALATINSKY

Come new Pro- Se Plaintiff Semue IHerwood Myles, who respectfully seek to file and Metien before and within the United States District Court For The Western District of Wisconsin, at this penticular time Pro- Se Plaintiff PRAY thet the District Court. . . ("GRANT"). . . his Metien for Reconsidere then For Appointment Of Legal Cours el Under And Pursuent To. . .

Section... 28 U.S.C.S. 8 1915 (d) Section... 28 U.S.C.S. 8 1915 (e)(1)

Medical Malpractice Case come's with Complexity...

(Lesal Issues)...necessity of factual investigation... (evidence on any of these issues will be hered to come by for the prisener confined to his cell, Cf. Fallen vs. United States)... (The district court should also take into consideration the complexity of the legal issues raised by the complexity of the legal issues raised by the complexity in deciding whether to eppoint counsel for an indisent. Maclin vs. Dr. Frecke)... of expert testimeny from and with in a... (full)... Medical Terminology with skills (or) specialized Knowledge within the comprehensible reason to fully explain the Medical Standard of Care and as to the ... (("Functioning"))... of...

(A. Hypentenisier (en Hypentensive...

(1). (c). Hypertenision Medice tien ...

(1).(1). em LODIPine ... (1). (2). Lisinopril. ..

(2). IV. cointrevenaco...

13). Nermelseline Indesica Selstica.

(4). ERB (er) ECB electrocordiograms...

(5). Pedictoist (en) Chinopedistice

ent from the Well's decision, it should have been appearent from the bat set that Jack son needed the expert testimony of a physician or health professional to prove two essential elements of his alaim is Jackson vs. County of McLeens.

Come new Pre-se Plein tith Some el Heywood Mylos, who respectfully. " ("PRAY")... that the District Count... ("BRANTO... Pro-se Ploin tith Mation for Recordi deretion For Appointment of Legel Coursel Under And Pursuent To...

Section. .. 28 U. P. C. S. 3 1915 (d)

Section ... 28 U.S. P.S. 5 1915 (e)(1)

vs. Nerthwest Wisconsin Heme Cere)...

dence of the ccuse and effect reletienship hetween the impeirment end the degree). From the completity of this cese come's with legel issues state thether is "particular" cese is (sa) complex thetit require and trained Attenney to litigate Pro-Se Plaintith. (Claim)...

Came nexiPre-se Pleintiff Some el Hey wead Myles, end federal Inmete who come 'Lefer e the District Court, inf. orma perpens stetute prevides that the District Court, inf. orma perpens stetute prevides that the District Court. (request)... (ca)... (appoint)... Les el Counsel to represent Pleintiff who et this penticular time is une-lie to affect a Coursel... and that the United Stetes District Court For The Western District al Wiscensia, to respectfully... (CGRANT)... Pleintiff Metienfer Recensidential For Appointment of Counsel Under And Pursuant to ... (Leth)... 28 U.S.C.S.S.1915 (d)... end... 28 U.S.C.S.S.1915 (d)... end... 28

e... (ORDER BY THE DISTRICT COURT)... (in pert)...
... (1) eted. June 16, 2015, ); DRt. ## 33-36. In oddition to det ermining whether pleintiff has mede
his own effects to recruit coursel, the court elso
considers whether the complexity of the cese
exceed's pleintiff ability to litigate it, Sentings
vs. Wells, )... (Porlitt vs. Mete,)...

... (ORDERBY THE DISTRICT COURT)... (in pert)...

... (Deted. June 18, 2015,)... Although medical
case claims can be aemplex and sometime require
expert testimony... (from Pase (6), (2). Hypertenisian (ar) Hypertensive, Hypertenisian Medication,
IV Normal saline Infesion Solution, EKB (ar) Ell,
and Podictrist (a) Chiropodist)... that necesoity of factual investigation necessity that wereat both Tesal counsel and expert testimony)
... (expert testimony, Forsy the vs. Perker)... (expert testimony, Balland vs. Zimmer)... (expert
testimony. Jackson vs. County of Melean)... (expert testimony, Richards vs. Mendivil)...

... (ORDEA BY THE DISTAICT COURT... in pert)...

(Deted. Jene 18, 2015, ). At this time I cennet

say whether that will be tree of plain tiff's cle.
ims because the fact, have not been developed
et this paint. Up to new plain tiff has been an active advacate for himself and was elle to fellby this court's instructions on providing evidence
of his effects to recreit coursel.

in on previding evidence of his effects the ereit centels.

11. in disent Pre-se Plaintith Some el Hoy wood Myles ineve en o hes me de reconcile effects to attain . ... (les al Coensel)...

ces. in disent Pre-se Prointiff Some el Hoy wood My/os, have end has ettemp to a Hain Legal Counsel Ly for woodis even some. ... (170-Letters) en to Atterney Offices, country of the DISTRICT COURT...in pert). DK+.#
33. To show that he has made effect on his ewn to recruit
counsel, plaintiff included capies of letters from more
than three lengers who have declined to essist him, )...

innespensing to the District Court's Orden Pleintiff Som-Lelley weed Myles, he's forward some... il 9 Copies of letters from some., (il- Stote)... shewing the + Pleintiff heve end he) ceted in good feith when ettemning to ettein Legal Counsel)...

Come new Pre-Se Plaintiff Same el Hay wood Myles, who respectfully seek to file and Mation for Reconsider nation For Appaintment of Coursel... (Under And Parscent To., (Leth)... (Section... 28 U.S.C.S. 8 1915 (d). a. Section... 28 U.S.C.S. 8 1915 (d). a. Section... 28 U.S.C.S. 1915 (e)(1)... that the United States IDistrict Court For The Mes tern District of Wiscensin, to respectfully... ((GRANT))... Pro-Se Plaintiff SemuelHay weed Myles, Metion for Reconsideration For Appointment of Coursel.

Medical Malprectice Cases came's with Complexity
... (Losel Issues)... necessity of factual investigation
necessity that werrent beth... (1). Legal Counsel...
(8). Expert Testimony the Court have to take end
acount the difficulty of Plaintiff claim to be competence...

The difficulty of this ease consided expert testimany de to the complex ... (Medical-Issues)..., and and expert witness with direct Medical evidence of the cause and effect relationship between the imnairment and the degree...

e. . . I, medical malpractice cases requires exnert testimony to establish the standard of care. Carney-Heyes vs. Northwest Wiscensin Home (cre)...

(1). indigent Pro-Se Plaintiff SemuelHeywood Myles, have end has made reasonable effects to attain expert wit-ness. . See: Attachment (1). page Exhibit...

(2). The difficulty of eny. ... (Medical Malpractice)...

cose factually and legally -- exceeds the particular Plaintiff's capacity as a layperson to coherent present it to the Judge (or) Jury himself in given the degree of difficulty when seeking. ... (expert witnesses) within the Medical fill)...

ent her since reteined emedical expert,

Dr. beorge VanHare, inpediatric electrophysiclosy.)... (For exemple, if the record

demenstrates that the prose plaintiff was
incapable of engasing in any investigation:

or evidence. Praith)... ("Lo] nly one expert
witness on each subject... each expert's

testimony shall be specified.")...

(3). and expent witness is ... (werrant) ... with direet Medical evidence of the cause and effect relationship Letween the impairment and the degree states that this "perticular" case is (so) complex that it would ... (require) ... and trained Alberney ... Come now Pre-Se Plaintiff SemuelHaywoodMyles, who
Proy the the District Court... ("GRANT")... in fever of
Pre-Se Plaintiff SemuelHaywood Myles, Metien for... Reconsideration For Appointment of Courseline

Under And Purshent 70...

Section 28 U.S.C.S. 3 1915 (d)

Section 28 U.S.C.S. 8 1915 (e)(1)

who have and has showed and act in good faith in.
which this case present complex legal issues that require Legal Cransel...

The District Court "improperly denied" Coursel when it failed to consider... (competency)... of Pro-Se "Prisoner" (or) Inmete...

iff Judgement And Commitment innerty...

87. Education and Vocational Skills ...

who ... ("Drop")... out of High School in the ... (tenth grade)... to represent himself, in addition tolegel complexity of cose, the District Court should consider "Plaintiff's" literacy, skills, education level litige tien experience [,]... in tellectual conacity... iss-Les one to complex for Plaintiff litigate and file detailed discovery...

Come new Indigent Pre- Se Meintiff Seme el Hayvvwood Myler, who respectfully have end has de manstreted recsencule ettemp13 to seeure Courselon his
own "Plain tiff" ege prere quisite to the Court's consideretian of Appointed Coursel.

Camenew Indi) ent Pro-se Pleintiff Semcelley wood Myles, who seek to file and Motion for Reconsideration For Appoint Of Counsel Under And Parsoent To Seetien 28 U.S.C.S. 81915 (e) (1) that the District Court... (BRANT)... Indi) ent Pro-se Pleintiff Semcel Haywood Myles, for Recensidentian For Appointment of Coursel...

After meeting this threshold burden, the plaintiff must demonstrate that heacese is one epprepriete farthe eppointment of counsel. In Medinv. Fecke, 1501.20885-89 (7th Cir. 1981), we set out a nonexhaustive list of five factors for courts to consider when deciding such emotion: (1), the menits of the plaintiff's claims, (8) whether the plaintiff con investigate conciet facts, (3) whether trained counsel will better ex-Dese the truth; (4) the pleintiff's clility to present the case, and (5), the complexity of the relevent legal issues. More recently, hewever, we stated that the necessary inquiry is simple - then Maelin's multifeetoricl enproach implies, given the difficcity of the case, [does] the plain till conear to be competent to try it himself and, if not, would the presence of econsel[meke] a differece in the outcome? "Farmer 43. Heas, 990 F. 2d 319, 322 (7th Cir.), eert denied. 182 L. Ed. 20 372, 1148. Ct. 438 (1993). Thes, courts now here an eldennetive, earler method for deciding these motions, one that we now employ, Page. (I), (3). school in 1974 in the tenth grade. There is nothin, to indicate that the defendent completed his farmel high school education as high school education as high school education as high school equivelency.

ed evidence to show that he had an educational level of a rixth grader... the judge will normally take into consideration the plaintiff's literacy, communication skin los, educational level... Pruitt sub mitted the results of prison tests showing he had the educational level of an early sixth grader (his composite meth and reading scares puthin at grade level 1.2. Pruittle...

... (These efforts demonstrate Zarnes's chility to investigate the underlying for at a despite her incorperation in Califiornic, as well as her apparent chility to present her claims. Zannes)... Ther, counts new have on elternative, easier method for deciding these motions, ene that we new employ. ... Zarnes.

Come new Pre-Se Plaintiff Somcel Heywood Myles, who Prey that the District Court GRANT in Lever of Plaintiff's metien for Recensideration For Appointment of Coursel.

These factors, coortlined by Meclin and its proseny, include: (1). whether the merits of the waim are colorelle; (2). the alility of the waim are colorelle; (2). the alility of the indigent to investigate crucial
facts; (3). whether the nature of the evidence indicates that the truth will mare
likely be exposed where both sides are represented by counsel; (4), the capability of
the indigent to present the case; and (5).
The complexity of the legal issues raised by
the complaint. Maclin, 150 F. 2d at 887-888.
Significantly, Jackson also stressed that
the district court should not undertatethe Meclin inquiry without first.

determining whether the prisoner mederecsenelle efforts to retain counsel hefere resorting to an eppoint ment by the evert. Jackson, No. 89-3838, slipop, at 5. By requiring to the
court to consider such efforts as a prerequisite to an application of the Medin enalysis, we haved to provide the district court
with furthe insight into distinguishing meritorious claims from those "patently frivolaes
and designed solely for the purpose of heressment" Id. at b. Bernhill....

come new Mo-Se Plaintiff SemuelHey woodMyles, who respactfully seek to file and Metion for Reconsideration Per Appointmental Counsel... (Under And Pursuant To)...

Section ... 28 U.S.C.S. & 1915 (d)

Section ... 28 U.S.C.S. 8 1915 (e)(1)

Plaintiff "Mary" that The United States District Court to ... (GRANT). .. leave and appoint Legal Coursel...

Five feeters ere te Le considered in determining whether en indijent civil litis entirequest for econsel should be grented. These factors are: (1). the merits of the indipent's claim for relief; (8). the ability of the indisent plaintiff to investigate creaiel facts uncided Ly coensel, (3). whether the netcre of the evidence indicates that the tra Lth will mere likely he exposed where both sides are represented by coursel, (4). the capelility of the indigent to present the cese, and (5). the complexity of the legal 18sces raised by the complaint. Failer eta identify and discuss these factors whencelins en a 28 U.S. C.S. & 1915(d) motion will be treeted as clear abuse of discretion Ly the district court, Jackson ....

is no other information to indicate the degree of the defendant's personal use of controlled substances. There is nothing to indicate that the defendant has ever participated in a drug treatment program of any kind.

#### Education and Vocational Skills

87. In an interview with U. S. Pretrial Services in December 1993, the defendant indicated that he completed a portion of high school at Libbey High School in Toledo, Ohio. The Lucas County presentence report indicated that the defendant had attended Libbey and Scott High Schools in Toledo, Ohio. The defendant last attended Scott High School in 1974 in the tenth grade. There is nothing to indicate that the defendant completed his formal high school education or high school equivalency.

Samuel Hazwood Myles